

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF KEVIN GANNON IN SUPPORT OF  
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT OF VALIDITY  
BASED UPON *INTER PARTES* REVIEW ESTOPPEL  
UNDER 35 U.S.C. § 315(e)(2)**

I, Kevin Gannon, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC ("Singular"), in this action. I submit this declaration in support of Singular's motion for partial summary judgment of validity based upon *inter partes* review estoppel under 35 U.S.C. § 315(e)(2).

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the Final Written Decision ("FWD") issued by the Patent Trial and Appeal Board ("PTAB") in IPR2021-00155.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the FWD issued by the PTAB in IPR2021-00165.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the FWD issued by the PTAB in IPR2021-00179.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from Google's Petition for IPR in IPR2021-00155.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts from Google's Petition for IPR in IPR2021-165.

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from Google's Petition for IPR in IPR2021-179.

8. Attached hereto as Exhibit G is a true and correct copy of the Appendix Listing of Exhibits contained in Google Petitions for IPR identified above.

9. Attached hereto as Exhibit H is a true and correct copy of Google's Responsive Contentions Regarding Non-Infringement and Invalidity served on counsel for Singular on November 6, 2020.

10. Attached hereto as Exhibit I is a true and correct copy of Google's Invalidity Claim Chart 1 (MANTRA I).

11. Attached hereto as Exhibit J is a true and correct copy of Google's Invalidity Claim Chart 2 (Cray T3D).

12. Attached hereto as Exhibit K is a true and correct copy of Google's Invalidity Claim Chart 3 (CNAPS).

13. Attached hereto as Exhibit L is a true and correct copy of Google's Invalidity Claim Chart 4 (SYNAPSE-1).

14. Attached hereto as Exhibit M is a true and correct copy of Google's Invalidity Claim Chart 5 (SPERT II).

15. Attached hereto as Exhibit N is a true and correct copy of Google's Invalidity Claim Chart 6 (Tong).

16. Attached hereto as Exhibit O is a true and correct copy of Google's Invalidity Claim Chart 7 (Dockser).

17. Attached hereto as Exhibit P is a true and correct copy of Google's Invalidity Claim Chart 8 (Shirazi).

18. Attached hereto as Exhibit Q is a true and correct copy of Google's Invalidity Claim Chart 9 (Aty *et al.*).

19. Attached hereto as Exhibit R is a true and correct copy of Google's Invalidity Claim Chart 10 (Belanović and Leeser).

20. Attached hereto as Exhibit S is a true and correct copy of Google's Invalidity Claim Chart 11 (Belanović Thesis).

21. Attached hereto as Exhibit T is a true and correct copy of Google's Invalidity Claim Chart 12 (Sudha *et al.*).

22. Attached hereto as Exhibit U is a true and correct copy of Google's Invalidity Claim Chart 13 (Xilinx Virtex-4 FPGA).

23. Attached hereto as Exhibit V is a true and correct copy of Google's Invalidity Claim Chart 14 (TI TMS320C32).

24. Attached hereto as Exhibit W is a true and correct copy of Google's Invalidity Claim Chart 15 (GRAPE-3).

25. Attached hereto as Exhibit X is a true and correct copy of Google's Invalidity Claim Chart 16 (Hoefflinger).

26. Attached hereto as Exhibit Y is a true and correct copy of Google's Invalidity Claim Chart 17 (Lee).

Executed at Boston, Massachusetts on November 3, 2022.

/s/ Kevin Gannon